

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

IMPLICIT, LLC,	§	
Plaintiff,	§	
	§	
v.	§	
	§	
IMPERVA, INC.	§	Case No. 2:19-cv-00040-JRG-RSP
	§	FORMER LEAD CASE
	§	
JUNIPER NETWORKS, INC.	§	Case No. 2:19-cv-00037-JRG-RSP
	§	
Defendants.	§	

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**JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT  
BETWEEN PLAINTIFF IMPLICIT, LLC AND DEFENDANT  
JUNIPER NETWORKS, INC.**

Plaintiff Implicit, LLC (“Implicit”) and Defendant Juniper Networks, Inc. (“Juniper”) hereby notify the Court that they have settled, in principle, the claims between them. Accordingly Plaintiff Implicit and Defendant Juniper jointly move the Court to stay all deadlines in the above-captioned case until November 6, 2020, to allow the parties to finalize the settlement of this matter.

Dated: October 7, 2020,

Respectfully submitted,

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Dated: October 7, 2020

Respectfully submitted,  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(V). Pursuant to Federal Rule of Civil Procedure 5(d) and Local Rule CV-5(d) and (e), any counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email on this 7<sup>th</sup> day of October, 2020.

/s/ William E. Davis

William E. Davis, III